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**IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF ARIZONA**

**CRISTI TUTTY and
TINA ARTIGLIO,**

Plaintiffs,

vs.

**MOHAVE COUNTY, by and
through the Mohave County
Board of Supervisors,**

**TOM SHEAHAN, Sheriff of
Mohave County, in his official
capacity as Sheriff of Mohave
County,**

**BRUCE BROWN, individually and
in his official capacity as Jail
Commander of Mohave County,**

**SHANNON MICHAEL CORRELL,
individually and in his official
capacity as a Mohave County
Detention Officer,**

Defendants.

Case No.:

**42 U.S.C §1983 COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF AND MONETARY
DAMAGES FOR VIOLATION OF
PLAINTIFFS' CIVIL RIGHTS**

COMPLAINT AND JURY DEMAND

I. Nature of the Case

1. Plaintiffs, Cristi Tutty and Tina Artiglio bring this lawsuit seeking declaratory, injunctive and monetary relief pursuant to 42 U.S.C. §1983, §1988 and the Fourth and Fourteenth Amendments to the United States Constitution and under the law of the State of Arizona, against Defendants, Mohave County, former Mohave County Sheriff Department Officer Shannon Correll, Mohave County Sheriff, Tom Sheahan, and Mohave County Jail Commander, Bruce Brown. This lawsuit is brought to redress the injuries Plaintiffs suffered as a result of the Defendants' conduct, policies, customs and procedures relating to the treatment of female detainees confined in the Mohave County Vanderslice Jail Substation in Mohave Valley, while Plaintiffs were in the care and custody of Mohave County, its Sheriff and his Department. In the manner described herein, Defendants, acting under the color of state law and within the scope of their employment, knowingly allowed a policy and practice of detaining female detainees over night in the Substation where the detainees were under the control and supervision of Defendant, Shannon Correll, a male detention officer, who himself was not properly supervised which allowed him to commit sexual crimes against the Plaintiffs with impunity. In addition, the Defendant Sheriff, Jail Commander and Mohave County developed and

1 maintained policies and customs exhibiting deliberate indifference to the
2 constitutional rights of the female detainees who were held at the
3 Substation, including detaining the women overnight without proper or
4 adequate facilities or staff to safely house female detainees. As a direct
5 result of these policies and customs, Defendant Shannon Correll was able
6 to commit acts of unlawful sexual misconduct on Plaintiffs including, but not
7 limited to, unlawful strip and body cavity searches, sexual assault and
8 unlawful sexual conduct.
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11 2. As a result of the above described policies and customs, officers of
12 Mohave County, including the defendant officers, believed that their actions
13 would not be properly monitored by supervising officers and that
14 misconduct would not be investigated for sanctioned, but would be
15 tolerated. The above described policies and customs demonstrated a
16 deliberate indifference on the part of policymakers of Mohave County to the
17 constitutional rights of persons within the County, and were the cause of
18 the violations of Plaintiffs' rights alleged herein.
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20 **II. Jurisdiction and Venue**

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22 3. This court has subject matter jurisdiction over this action pursuant
23 to 28 U.S.C. §§1331, 1343, and 2201, and the supplemental jurisdiction of
24
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1 this Court to entertain claims arising under state laws pursuant to 28 U.S.C.
2 §1367(a).

3
4 4. Venue is proper in the District of Arizona, as the parties are
5 residents of and/or headquartered in Arizona and the conduct which gives
6 rise to this action occurred within that District. 28 U.S.C. §1391(b). Each
7 claim herein arises out of incidents that occurred on July 6, 2012 and
8 August 4, 2012, within Mohave County and the State of Arizona and
9 involved officers employed by the Mohave County Sheriff's Department and
10 acting under the color of law and the authority of Mohave County and its
11 Board of Supervisors.
12

13 14 **III. Parties**

15 **A. Plaintiffs**

16
17 5. Plaintiff, Cristi Tutty, is a citizen of the United States, and a resident
18 of Arizona. Plaintiff Tutty was unlawfully subjected to a strip and body
19 cavity search and to unlawful sexual conduct by Defendant Shannon
20 Correll on August 4, 2012, while in the care and custody of the Mohave
21 County Sheriff's Department.
22

23 6. Plaintiff, Tina Artiglio, is a citizen of the United States, and a
24 resident of Arizona. Plaintiff Artiglio was unlawfully subjected to a strip and
25 body cavity search and unlawful sexual conduct by Defendant Shannon

1 Correll on July 6, 2012, while in the care and custody of the Mohave
2 County Sheriff's Department.

3 **B. Defendants**
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5 7. Defendants Correll, Sheahan and Brown were at all times relevant
6 to this Complaint duly appointed officers of the Mohave County Sheriff's
7 Department, acting under color of law, including the statutes, ordinances,
8 regulations, policies, customs and usages of the Mohave County Sheriff's
9 Department and/or Mohave County.
10

11 8. Defendant, Mohave County is Defendant Mohave County is a
12 political subdivision of the State of Arizona as further defined in Title II of
13 the Arizona Revised Statutes as is the public employer of the individual
14 defendant officers named herein.
15

16 **Cristi Tutty**
17

18 9. On August 4, 2012 at approximately 2:33 a.m., Plaintiff, Cristi
19 Tutty, was involved in an argument with her then boyfriend, Casey Phillips.
20 Mr. Phillips, who is the father of Ms. Tutty's children, was arrested but Ms.
21 Tutty asked to be taken to jail so that Mr. Phillips, who was scheduled to
22 work the next day, would not lose his employment. Ms. Tutty was then
23 taken to the Mohave County Sheriff Department's ("Department")
24 Vanderslice Substation in Mohave Valley, Arizona ("Substation"). The
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1 arresting officer was Mohave County Deputy Sheriff, M. Rogers (P58).
2 Deputy Rogers walked Ms. Tutty into the Substation where he asked her a
3 few questions and completed his report. When Officer Rogers was finished,
4 he left the facility and Mohave County Sheriff's Department Detention
5 Officer Shannon Correll (J179) took custody of Ms. Tutty. Officer Shannon
6 Correll was the only officer at the facility that night and was responsible for
7 the care, control and supervision of both male and female detainees and/or
8 inmates at the facility. Upon information and belief it was a common
9 practice of the Department to have only one unsupervised male detention
10 officer on duty at the Substation and to allow that officer to have
11 unsupervised contact with and control over female detainees and/or
12 inmates who were housed at the Substation.
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16 10. Officer Correll took Ms. Tutty into a room, across from the
17 facility's kitchen area, which contained several surveillance monitors.
18 Officer Correll sat down at his computer and directed Ms. Tutty to remove
19 any body jewelry. After doing so, he asked her the color of her bra, shirt,
20 shorts and flip flops. After she answered his questions, he asked her the
21 color of her underwear. Ms. Tutty replied that she was not wearing any
22 underwear at that time. Officer Correll responded by stating, "that's hot".
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1 Ms. Tutty attempted to ignore his comment. Officer Correll then took Ms.
2 Tutty to be finger printed.

3 11. After the finger printing was finished, Officer Correll advised Ms.
4 Tutty that he had to perform a "mandatory" strip search of her person prior
5 to her being booked into the facility. Officer Correll directed Ms. Tutty to
6 follow him to a door that exited the building to an outside area that was
7 fenced in. Officer Correll walked Ms. Tutty to a storage shed located
8 behind the detention facility. Officer Correll walked Ms. Tutty up a plywood
9 ramp into the shed. Once inside, Officer Correll shut the door and Ms.
10 Tutty observed yard tools and inmate uniforms and orange shoes in the
11 shed. Ms. Tutty asked Officer Correll if she was to change into a jail
12 uniform afterward. Officer Correll responded that he was just going to
13 conduct the strip search there in the shed. He then told Ms. Tutty to move
14 away from the window so that "they" could not see her. Ms. Tutty stood in
15 front of the door with her back to the door and with Officer Correll facing
16 her.
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18 12. Officer Correll instructed Ms. Tutty to remove her shirt. Ms. Tutty
19 complied with his instruction. As Ms. Tutty faced Officer Correll, he
20 directed her to remove her bra. She complied and placed both her shirt
21 and bra on the chair next to her. Officer Correll then directed Ms. Tutty to
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1 face him topless and raise her arms. He then instructed her to remove her
2 shorts. Ms. Tutty informed him that she didn't feel comfortable complying
3 with his instruction because she was not wearing any underwear. Officer
4 Correll replied that it was a "mandatory" strip search. Ms. Tutty reluctantly
5 removed her shorts. Officer Correll then directed Ms. Tutty to face him and
6 to spread her legs. He then directed Ms. Tutty to turn her back to him,
7 spread her legs, bend over and cough. Ms. Tutty was mortified by this
8 directive because she had recently given birth to her daughter and was
9 menstruating at the time. Nevertheless, she complied with the directive.
10 Upon seeing her condition, Officer Correll instructed her to put her clothes
11 back on. As Ms. Tutty started to do so, Officer Correll commented that she
12 had nice breasts. He then told Ms. Tutty that he would love to touch her
13 breasts. Ms. Tutty ignored his proposition and finished dressing. Officer
14 Correll stood in front of Ms. Tutty as though he was waiting for an answer.
15 A few moments later Officer Correll opened the door and allowed Ms. Tutty
16 to exit the shed.

21 13. As they were walking back into the detention facility, Officer
22 Correll told Ms. Tutty that she had an "amazing body." They walked back
23 into the building and Ms. Tutty was directed to sit in the chair located
24 outside Officer Correll's office. Officer Correll entered information into the
25

1 computer while Ms. Tutty sat in the chair thinking about what had just
2 occurred and worrying about what would happen next. Officer Correll asked
3 Ms. Tutty what it would take to get her “to go back out into the shed” with
4 him. Ms. Tutty looked at him and shook her head no. Officer Correll went
5 back into his office, looked at Ms. Tutty one more time, and asked her
6 again about going back out into the shed. Ms. Tutty responded that she
7 was a “married mother.” Officer Correll then stated that Ms. Tutty was a
8 “mother he would love to do dirty things to.” Officer Correll also made a
9 statement to Ms. Tutty about how well his propositions had worked
10 previously with other female arrestees and/or inmates.
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14 14. After some time Officer Correll told Ms. Tutty that since she would
15 not go back outside with him, there was a mat on the floor for her to sleep
16 on. Ms. Tutty laid on the mat and covered herself with the grey and white
17 wool blanket. As Officer Correll walked back into his office he commented
18 to Ms. Tutty that he could “guarantee” she would have had a “good time” if
19 she had gone back to the shed with him. At this point, Ms. Tutty feared that
20 Officer Correll would sexually assault her because he seemed determined
21 to have sexual relations with her. Ms. Tutty laid on the floor awake for as
22 long as she could until she finally fell asleep. Ms. Tutty was awakened by
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25 Detention Officer Montgomery telling her that she was going to be seeing a

1 judge shortly. When Ms. Tutty saw the judge she was ordered released on
2 her own recognizance.

3 15. When Ms. Tutty was picked up by her mother, she told her
4 mother what had happened, how humiliated she was and how dirty she felt
5 after the experience. Ms. Tutty's mother could not believe that a strip
6 search had been conducted without a female officer present. Upon arriving
7 at her home Ms. Tutty told her boyfriend, Casey Phillips, about the strip
8 search. Mr. Phillips then called the Vanderslice Substation. He spoke with
9 Detention Officer Montgomery about what had occurred and about Ms.
10 Tutty's concerns about the Sheriff Department's policies concerning strip
11 searches of females. Officer Montgomery gave Mr. Phillips a phone
12 number to call regarding the concerns and advised that nothing could be
13 done until the following Monday.

14 16. On August 12, 2012, Ms. Tutty came to the Mohave County's
15 Sheriff's Department in Kingman, Arizona and provided her statement
16 concerning the strip search incident to Detective McNally. Ms. Tutty's
17 mother, Caron Warner, also provided a statement. Later that day,
18 Detective McNally interviewed Detention Officer Correll concerning Ms.
19 Tutty's allegations. Officer Correll initially denied Ms. Tutty's allegations but
20 later admitted taking Ms. Tutty to the shed and having her remove all of her
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1 clothes so he could conduct an unauthorized strip search of Ms. Tutty who
2 he found attractive.

3
4 17. On August 20, 2012, Officer Correll was arrested at his home by
5 Detective McNally. Officer Correll was booked into the Mohave County
6 Sheriff's Detention Center in Kingman, Arizona. While at the detention
7 center, Officer Correll admitted to nurse Jessica Rachett that he had strip
8 searched Ms. Tutty because he was "bored."

9
10 18. During the investigation of Officer Correll, Detective(s)
11 interviewed male inmates who were at the Substation on August 4, 2012.
12 Two inmates told the Detective(s) that they overheard some of the
13 conversation between Officer Correll and Ms. Tutty and confirmed Ms.
14 Tutty's account of the conversation. The inmates also told the Detective(s)
15 that they had witnessed Officer Correll make sexual advances towards at
16 least two other female detainees on other nights and that he had bragged
17 to the male inmates about having had sexual intercourse in the shed with at
18 least one of those female inmates. According to the inmates, this incident
19 occurred a few weeks prior to the incident involving Ms. Tutty. The inmates
20 provided the Detective(s) with descriptions of the two other female inmates
21 who Correll had made advances toward.

1 19. On November 15, 2012, Officer Correll pled guilty to one count of
2 unlawful sexual conduct involving Ms. Tutty. Three other felony charges
3 were dismissed as part of the plea agreement.
4

5 A timely notice of claim was served on the Defendant Officers and
6 entities involved pursuant to A.R.S. §12-821.01. The claim was denied.
7

8 **TINA ARTIGLIO**
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10 20. On July 6, 2012, Ms. Artiglio was arrested for an alleged traffic
11 warrant and transported to the Mohave County Sheriff Department's
12 Vanderslice Substation in Mohave Valley. When Ms. Artiglio was being
13 booked into the jail Detention Officer Correll began telling her how "sexy"
14 she was, that she had the "hottest body" he had ever seen, and he asked
15 her if she "wanted to play and have some fun". Ms. Artiglio tried to ignore
16 Correll but she could not get him to stop harassing her. Officer Correll then
17 instructed Ms. Artiglio to go with him to the laundry room to get some jail
18 clothes. Ms. Artiglio began to get suspicious and feel uncomfortable, telling
19 him that there were a lot of cameras and someone might see; however, he
20 told her that no one watches the cameras and there were no cameras past
21 the smoking area. Officer Correll told her that he could also erase the video
22 from the cameras and if anyone asked, he would just say he was on a
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1 smoke break. Ms. Artiglio then acquiesced to Officer Correll's authority and
2 went with him.

3
4 21. When the two entered the laundry room, which is located in the
5 storage shed outside of the main station where Officer Correll later took
6 Plaintiff Tutty, Officer Correll told Ms. Artiglio to sit on the washing machine
7 and she complied. Correll undid his pants and proceeded to masturbate.
8 He ejaculated towards Ms. Artiglio and then approached her and pushed
9 her backwards onto the washing machine, lifted up her dress and began to
10 have sexual intercourse with her, which was forceful and lasted
11 approximately 20 to 30 minutes. No protection was used. She did not
12 perform oral sex on him, but believes he performed oral sex on her.
13
14 Although Ms. Artiglio never said, "No" and did not yell out for help, she was
15 scared and felt like she had no choice but to endure the assault as she did
16 not know what he would do to her if she denied his advances. Ms. Artiglio
17 refused to talk dirty to Correll when he asked her to. Moreover, Ms. Artiglio
18 refused to show Officer Correll her breasts when he asked to see them. He
19 did, though, end up taking off her bra, which he placed with her other
20 clothing items after the assault.
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24 22. Two inmates who were confirmed to have been incarcerated on
25 July 6, 2012, told Detectives later that they overheard Officer Correll

1 bragging to other inmates about having sex with a female inmate that night.
2 One inmate did not remember the name of the female but described her as
3 wearing a black dress and that she had reddish, bright colored hair. The
4 booking photo of Ms. Artiglio clearly shows Ms. Artiglio wearing a black
5 dress and that her hair is a red color.
6

7 23. A second inmate reported he was sleeping in his cell when he
8 heard a woman come in and overheard Officer Correll, who he described
9 as a "loose cannon," say he "had his way in the back with a female inmate".
10 The second inmate also described the female as wearing a black dress and
11 with short brownish or reddish hair.
12

13 24. After being released from jail, Ms. Artiglio disclosed to her mother
14 what happened. Her mother wanted Ms. Artiglio to file a complaint;
15 however, Ms. Artiglio was adamant that she was afraid of Officer Correll
16 and did not want to report anything because she did not know whether she
17 would end up speaking to a "good or bad cop." She further told her mother
18 that she was terrified that Officer Correll and other officers could harm her
19 or retaliate against her if she made a complaint. The sexual assault
20 incident only came to light on December 19, 2012 when Ms. Artiglio
21 disclosed to another officer that she had been sexually assaulted by a
22 guard at the Vanderslice Substation months earlier. Ms. Artiglio identified
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1 Officer Shannon Correll during a photo lineup and when asked by the
2 Detective if there was a reason she had chosen that particular individual,
3 Ms. Artiglio said, "Because that's who it is".
4

5 25. Defendant Correll later pled guilty to unlawful sexual conduct
6 involving Ms. Artiglio. Defendant Correll was subsequently sentenced to
7 prison for his assaults on Ms. Tutty and Ms. Artiglio.
8

9 **IV. Claims for Relief**

10 **Count I**
11 **42 U.S.C. §1983 Unreasonable Search and Seizure**

12 26. Paragraphs 1 through 25 are incorporated herein by reference as
13 though fully set forth.
14

15 27. Defendant, Shannon Correll, acting under color of law, subjected
16 Plaintiff Tutty to an illegal strip and body cavity search, in violation of the
17 Fourth Amendment guarantee against unreasonable searches and
18 seizures. Those actions give rise to Plaintiff Tutty's claims pursuant to the
19 Fourth, Fifth, and Fourteenth Amendments to the Constitution of the United
20 States, and 42 U.S.C. §1983.
21

22 28. Defendant, Shannon Correll, acting under color of law, subjected
23 Plaintiff Artiglio to an illegal strip and body cavity search, in violation of the
24 Fourth Amendment guarantee against unreasonable searches and
25

1 seizures. Those actions give rise to Plaintiff Artiglio's claims pursuant to
2 the Fourth, Fifth, and Fourteenth Amendments to the Constitution of the
3 United States, and 42 U.S.C. §1983.
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5 29. The Defendant's acts were intentional and done in violation of
6 Plaintiff Tutty and Plaintiff Artiglio's legal and constitutional rights, and have
7 directly and proximately caused Plaintiffs' humiliation, mental pain,
8 suffering and other injuries as described above.
9

10 **Count II**
11 **42 U.S.C. §1983 Unlawful Sexual Conduct (Plaintiff Tutty)**

12 30. Paragraphs 1 through 25 are incorporated herein by reference as
13 though fully set forth.
14

15 31. Defendant, Shannon Correll, acting under color of law, engaged in intentional
16 unlawful sexual conduct on August 4, 2012, when he directed Plaintiff Tutty, who was in
17 his care and custody, to remove her clothing in his presence, to display her breasts and
18 private parts to him and to bend over so that he could view her buttocks and vaginal
19 area.
20

21 32. The Defendant's acts were intentional and done in violation of
22 Plaintiff Tutty's legal and constitutional rights, and have directly and
23 proximately caused Plaintiff Tutty to suffer humiliation, mental pain,
24 suffering, and other injury described above.
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1 33. The acts of Defendant Correll constituted a violation of A.R.S.
2 §1419, Unlawful Sexual Conduct and give rise to Plaintiff Tutty's claims
3 pursuant to the Fourth, and Fourteenth Amendments to the Constitution of
4 the United States, and 42 U.S.C. §1983.
5

6 **Count III**
7 **42 U.S.C. §1983 Unlawful Sexual Conduct (Plaintiff Artiglio)**

8 34. Paragraphs 1 through 25 are incorporated herein by reference as
9 though fully set forth herein.

10 35. Defendant Correll, acting under color of law, committed unlawful
11 sexual conduct on July 6, 2012, when he directed Plaintiff Artiglio, who was
12 in his care and custody, to accompany him to the storage shed behind the
13 Mohave County Sheriff Department's Vanderslice Substation in Mohave
14 Valley where he directed her to sit on the washing machine as he
15 unbuttoned his pants and masturbated in front of her until he ejaculated
16 towards her. He then pushed Plaintiff Artiglio onto her back, raised her
17 dress and engaged in non-consensual sexual intercourse with Plaintiff
18 Ariglio and later removed her bra exposing her breasts.
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22 **Count IV**
23 **42 U.S.C. §1983 Equal Protection**

24 36. Paragraphs 1 through 25 are incorporated herein by reference as
25 though fully set forth.

1 37. Defendant, Shannon Correll, acting under color of law, engaged
2 in intentional gender discrimination when he subjected Plaintiffs Tutty and
3 Artiglio, but not the male detainees under his care and control, to a strip
4 search and body cavity inspection. In so doing, Defendant Correll has
5 caused the Plaintiffs to suffer the deprivation of their fundamental rights to
6 liberty and to be free from unlawful searches and seizures on account of
7 their gender. These actions violated Plaintiffs' rights to equal protection of
8 the laws, in violation of the Fourteenth Amendment to the Constitution of
9 the United States.

12 38. The acts of Defendant Shannon Correll were intentional and done
13 in violation of Plaintiffs' legal and constitutional rights, and have directly and
14 proximately caused Plaintiffs' humiliation, mental pain, and suffering, and
15 other injuries as described above.

17 **COUNT V**

18 **42 U.S.C. §1983 Against Mohave County Sheriff, Tom**
19 **Sheahan, Mohave County Sherriff Department's Jail**
20 **Commander, Bruce Brown, and Mohave County**

21 39. Paragraphs 1 through 25 are incorporated herein by reference as
22 though fully set forth herein.

23 40. Upon information and belief, prior to July 6, 2012, Defendants
24 developed and maintained policies or customs exhibiting deliberate
25 indifference to the constitutional rights of female detainees in the care and

1 custody of Mohave County, which caused the violation of Plaintiffs Tutty's
2 and Artiglio's rights.

3 41. It was the policy and/or custom of Mohave County to inadequately
4 and improperly care for female detainees held at the Mohave Valley
5 Vanderslice Substation by leaving them under the supervision of, and in the
6 care and custody of, Defendant, Shannon Correll, without proper
7 supervision and without adequate facilities and other resources to house
8 and protect female detainees from the conduct of Defendant, Shannon
9 Correll or other male officers or detainees. This failure to supervise
10 Defendant Correll allowed him to violate the rights of female detainees
11 including, but not limited to, conducting strip searches and body cavity
12 searches of females and committing unlawful sexual acts against these
13 females while they were in the custody of Mohave County.
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18 42. It was the policy and/or custom of Defendants to inadequately
19 supervise its detention officers, including Defendant Correll, thereby failing
20 to adequately discourage further constitutional violations on the part of its
21 officers.
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23 43. As a result of the above described policies and customs, officers
24 of the Mohave County Sheriff's Department, including Defendant Correll,
25

1 believed that their actions would not be properly monitored by supervisory
2 officers and that misconduct would not be investigated or sanctioned.

3 As a result of these policies and/or customs, Plaintiffs Tutty and Artiglio
4 suffered the damages described above in violation of the Fourth and
5 Fourteenth Amendments to the United States Constitution and 42 U.S.C.
6 §1983. .
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9 **COUNT VI**
10 **Assault and Battery Against Defendant Shannon Correll**

11 44. Paragraphs 1 through 25 are incorporated herein by reference as
12 though fully set forth.

13 45. Defendant Shannon Correll assaulted and battered Plaintiffs Tutty
14 and Artiglio in violation of Arizona state law, the Fourth and Fourteenth
15 Amendments to the United States Constitution and 42 U.S.C. §1983.
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17 46. As a result of this assault and battery, Plaintiffs Tutty and Artiglio
18 suffered damages as described above.

19
20 **COUNT VII**
21 **Infliction of Emotional Distress**

22 47. Paragraphs 1 through 25 are incorporated herein by reference as
23 though fully set forth.
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1 48. Defendant Correll, acting under the color of law, intentionally,
2 recklessly or negligently inflicted emotional distress on Plaintiffs Tutty and
3 Artiglio.
4

5 49. As a result of Defendant Correll's conduct, Plaintiffs Tutty and
6 Artiglio suffered the damages described above in violation of Arizona state
7 law, the Fourth and Fourteenth Amendments to the United States
8 Constitution and 42 U.S.C. §1983.
9

10 **COUNT VIII**
11 **Invasion of Privacy**

12 50. Paragraphs 1 through 25 are incorporated herein by reference as
13 though fully set forth.

14 51. Defendant Correll, under the color of law, intentionally engaged in
15 the conduct described above, including the strip and body cavity search of
16 Plaintiff Tutty, and the sexual assault of Plaintiff Artiglio, which misconduct
17 constituted an unlawful and unwarranted invasion of Plaintiffs' privacy.
18

19 52. As a result of this unlawful invasion of privacy, Plaintiffs suffered
20 gross humiliation, emotional distress and the other damages described
21 above in violation of Arizona State law, the Fourth and Fourteenth
22 Amendments to the United States Constitution and 42 U.S.C. §1983..
23

24 **V. Prayer for Relief**
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WHEREFORE, Plaintiffs request that this Court:

- 1 (a) Award compensatory damages to Plaintiffs against the
2 Defendants;
3 (b) Award punitive damages to Plaintiffs against Defendants
4 Correll and Brown;
5 (c) Award such other injunctive and declaratory relief and
6 further relief as this Court may deem appropriate;
7 (d) Enjoin Defendant Mohave County from housing female
8 detainees at the Vanderslice Substation of the Mohave
9 County Sheriff's Department's Jail without adequate and
10 proper facilities, staff and other resources to safely protect
11 and house female detainees; and
12 (e) Award reasonable attorney's fees and costs to Plaintiffs.
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16 **VI. Jury Demand**

17 Plaintiffs hereby demand a trial by jury.

18 Respectfully submitted this 4th day of August, 2013.

19
20 /ss/

21 _____
22 Lee Phillips
23 Attorney for Plaintiffs,
24 Cristi Tutty and Tina Artiglio
25